

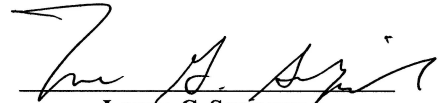
BIEDERMANN-HOENIG-SEMPREVIVO
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

ONE GRAND CENTRAL PLACE
60 EAST 42ND STREET
NEW YORK, NY 10165
TEL 646-218-7560
FAX 646-218-7510
WWW.LAWBHS.COM

Application GRANTED in part and DENIED in part. This Court does not ordinarily stay discovery pending a motion to dismiss. Given the difficulties with commencing discovery at the end of the school year the Court will allow a 45-day extension for each of the standard discovery deadlines. The parties shall resubmit a proposed case management plan that reflects these extensions by **April 24, 2023**.

Dated: April 20, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Johnson Tucker et al. v. Loyola School, et. al.,
23-CV-1351 (JW)(LGS)

Your Honor:

We represent defendants Loyola School (the "School"), Tony Oroszlany, James Lyness, Bridget Cintron, Daniel Sullivan, Francis Buckley-Lawson, Yesenia Ferran, Mary Christine Andrews, Jacques Joseph, Sunita Meyers, David Palladino, Abby MacLain (sued incorrectly as Abby McClain), Mary Ann Lynch-Minson, and Jalma Guevara (collectively, the "Individual Defendants"), in the above referenced matter. We write to respectfully request a stay of discovery in this matter due to the anticipated filing of Motions to Dismiss on behalf of the School and Individual Defendants. Plaintiff's counsel, Derek Sells, Esq., consents to this request. In the alternative that the Court does not grant the above request, we are submitting a joint proposed Case Management Plan and Scheduling Order. The undersigned was experiencing technical difficulties with Pacer in regards to the filing of this Letter which has since been resolved and apologizes for the late filing of this proposed Order.

We recognize Your Honor's Individual Practices § III(C)(2), with regard to Motions to Dismiss; however, the School and Individual Defendants request a stay of discovery as the school year is currently ongoing and commencing discovery towards the end of the school year would cause a great burden to the School and its faculty. Additionally, the Motions to Dismiss we anticipate filing, if successful, would dismiss the matter in its entirety against the School and the Individual Defendants.

In view of the foregoing, it is respectfully requested that the Court grant the within requests. We thank the Court for its consideration of this matter.

Respectfully submitted,

Giancarlo Santino Vecchiarelli /s/

Giancarlo Santino Vecchiarelli

Encl. Proposed Order

cc: By ECF

All counsel of record